

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Amy Victoria Ramirez Rodriguez

19cv4409

Write the full name of each plaintiff.

____ CV ____
(Include case number if one has been assigned)

-against-

Vanessa E. Morales

Tara A. Griffin

Stacey Friedman

J.P. Morgan, Chase & Co.

Write the full name of each defendant. If you need more space, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed above must be identical to those contained in Section II.

COMPLAINT

Do you want a jury trial?

☒ Yes ☐ No

NOTICE

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

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I. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000, is a diversity case. In a diversity case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal-court jurisdiction in your case?

☒ **Federal Question**

☐ **Diversity of Citizenship**

A. If you checked Federal Question

Which of your federal constitutional or federal statutory rights have been violated?

42 U.S.C. Title I § 12112 - Discrimination, 3 Disabilities.

42 U.S.C. Title I § 12203 - Retaliation & Interference

42 U.S.C. Title I § 1981 - Punitive Damages

EEOC Charge & Notice attached

B. If you checked Diversity of Citizenship**1. Citizenship of the parties**

Of what State is each party a citizen?

The plaintiff, _____, is a citizen of the State of _____
(Plaintiff's name)

(State in which the person resides and intends to remain.)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of _____

If more than one plaintiff is named in the complaint, attach additional pages providing information for each additional plaintiff.

If the defendant is an individual:

The defendant, _____, is a citizen of the State of
(Defendant's name)

or, if not lawfully admitted for permanent residence in the United States, a citizen or
subject of the foreign state of _____

If the defendant is a corporation:

The defendant, _____, is incorporated under the laws of
the State of _____

and has its principal place of business in the State of _____

or is incorporated under the laws of (foreign state) _____

and has its principal place of business in _____

If more than one defendant is named in the complaint, attach additional pages providing
information for each additional defendant.

II. PARTIES

A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional
pages if needed.

Amy V. Ramirez Rodriguez
First Name Middle Initial Last Name

16 Colonel Robert Magaw Place Apt. 24C
Street Address

New York NY 10033
County, City State Zip Code

(646) 373-9432 Rodriguez A. Ramirez@gmail.com
Telephone Number Email Address (if available)

B. Defendant Information

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1: Vanessa E. Morales
 First Name Last Name
Compliance
 Current Job Title (or other identifying information)
270 Park Ave, J.P. Morgan Chase & Co.
 Current Work Address (or other address where defendant may be served)
New York New York 10017
 County, City State Zip Code

Defendant 2: Tara A. Griffin
 First Name Last Name
Legal Counsel
 Current Job Title (or other identifying information)
270 Park Avenue, J.P. Morgan Chase & Co.
 Current Work Address (or other address where defendant may be served)
New York New York 10017
 County, City State Zip Code

Defendant 3: Stacey Friedman
 First Name Last Name
General Counsel, Chief Legal Officer JPMC
 Current Job Title (or other identifying information)
270 Park Avenue, J.P. Morgan Chase & Co.
 Current Work Address (or other address where defendant may be served)
New York New York 10017
 County, City State Zip Code

Defendant 4: J.P. Morgan Chase & Co.
 First Name Last Name

270 Park Avenue
 Current Job Title (or other identifying information)

New York New York 10017
 Current Work Address (or other address where defendant may be served)
 County, City State Zip Code

III. STATEMENT OF CLAIM

Place(s) of occurrence: New York City, New York (Brooklyn & Manhattan)

Date(s) of occurrence: June, July, August: 2014

FACTS:

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and what each defendant personally did or failed to do that harmed you. Attach additional pages if needed.

1. Plaintiff is of protected status
2. Plaintiff was employed by defendant
3. Plaintiff requested reasonable accommodation
4. Plaintiff was harassed by Defendant
5. Plaintiff terminated due to Defendant's failure to accommodate her disabilities.

INJURIES:

If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received.

Lost income following professional development
2) Pain and Suffering: delay in adequate treatment of pre-existing disabilities and additional therapeutic and psychiatric care following Defendant's violations and retaliation.

IV. RELIEF

State briefly what money damages or other relief you want the court to order.

1) \$1 Million: General, Special, and Punitive Damages
2) Amended and redressed Personnel file
3) Order JPMC to design or purchase and incept an ADA-Awareness training program for ALL employees and an ADA-Management training program for employees who supervise others; these programs could be comparable to existing training programs for Antimoney Laundering, Material Non-Public Information, Ethical workplace behaviors, etc.
To create career-long adherence to 42 U.S.C. as a normative business practice for JPMC. Plaintiff to be featured in both training programs.

V. PLAINTIFF'S CERTIFICATION AND WARNINGS

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

5/14/2019
 Dated Amy V. Ramirez Rodriguez
 Plaintiff's Signature
Amy V. Ramirez Rodriguez
 First Name Middle Initial Last Name
16 Colonel Robert Magaw Place Apt. 24C
 Street Address
New York NY 10033
 County, City State Zip Code
(646) 373-9432 RodriguezA.Ramirez@gmail.com
 Telephone Number Email Address (if available)

I have read the Pro Se (Nonprisoner) Consent to Receive Documents Electronically:

☒ Yes ☐ No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.

EEOC Form 161-B (11/16)

U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

NOTICE OF RIGHT TO SUE (ISSUED ON REQUEST)

To: Amy V. Ramirez Rodriguez
16 Colonel Robert Magaw Place
Apartment 24C
New, NY 10033

From: New York District Office
33 Whitehall Street
5th Floor
New York, NY 10004

☐

On behalf of person(s) aggrieved whose identity is
CONFIDENTIAL (29 CFR §1601.7(a))

EEOC Charge No.

EEOC Representative

Telephone No.

520-2019-01930

Jiancheng Wang,
Investigator

(212) 336-3753

(See also the additional information enclosed with this form.)

NOTICE TO THE PERSON AGGRIEVED:

Title VII of the Civil Rights Act of 1964, the Americans with Disabilities Act (ADA), or the Genetic Information Nondiscrimination Act (GINA): This is your Notice of Right to Sue, issued under Title VII, the ADA or GINA based on the above-numbered charge. It has been issued at your request. Your lawsuit under Title VII, the ADA or GINA **must be filed in a federal or state court WITHIN 90 DAYS of your receipt of this notice**; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a claim under state law may be different.)

☐

More than 180 days have passed since the filing of this charge.

☒

Less than 180 days have passed since the filing of this charge, but I have determined that it is unlikely that the EEOC will be able to complete its administrative processing within 180 days from the filing of this charge.

☒

The EEOC is terminating its processing of this charge.

☐

The EEOC will continue to process this charge.

Age Discrimination in Employment Act (ADEA): You may sue under the ADEA at any time from 60 days after the charge was filed until 90 days after you receive notice that we have completed action on the charge. In this regard, **the paragraph marked below applies to your case:**

☐

The EEOC is closing your case. Therefore, your lawsuit under the ADEA **must be filed in federal or state court WITHIN 90 DAYS of your receipt of this Notice**. Otherwise, your right to sue based on the above-numbered charge will be lost.

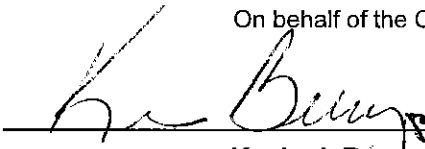
☐

The EEOC is continuing its handling of your ADEA case. However, if 60 days have passed since the filing of the charge, you may file suit in federal or state court under the ADEA at this time.

Equal Pay Act (EPA): You already have the right to sue under the EPA (filing an EEOC charge is not required.) EPA suits must be brought in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that **backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.**

If you file suit, based on this charge, please send a copy of your court complaint to this office.

On behalf of the Commission


Kevin J. Berry,
District Director

2/19/2019
(Date Mailed)

Enclosures(s)

cc:

Attn:
Director of Human Resources
JP MORGAN CHASE
270 Park Avenue
New York, NY 10017



U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
New York District Office

33 Whitehall Street, 5th Floor
New York, NY 10004-2112
For General Information: (800) 669-4000
District Office: (212) 336-3620
General FAX: (212) 336-3790

Amy Ramirez Rodriguez
16 Colonel Robert Magaw Place
Apartment 24C
New York, NY 10033

Re: *EEOC Charge No. 520-2019-01930*
Ramirez Rodriguez v. J.P. Morgan Chase

Dear Ms. Ramirez Rodriguez:

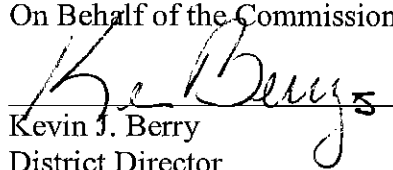
This office is in receipt of your request for a *Notice of Right to Sue* on the above-referenced charge.

Ordinarily, a charging party or his/her counsel is not entitled to receive a *Notice of Right to Sue* upon request until the charge has been pending with the EEOC for at least 180 days. However, an early *Notice of Right to Sue* is authorized by 29 C.F.R. § 1601.28(a)(2) if the Director determines that the Commission will not be able to complete its administrative process within 180 days of the date the charge was filed.

We have reviewed all of the circumstances of this case and have determined that issuing you the requested *Notice of Right to Sue* is warranted at this time. Specifically, given our office's current workload, we have concluded that the EEOC will be unable to complete the processing of this charge within 180 days of the date the charge was filed.

Enclosed is your *Notice of Right to Sue*. If you have any questions, please contact Investigator Jiancheng Wang at (212) 336-3753.

On Behalf of the Commission


Kevin J. Berry
District Director

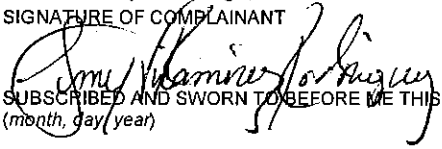

2/19/2019
Date

enc.

cc: Attn: Director of Human Resources
JP MORGAN CHASE
270 Park Avenue
New York, NY 10017

EEOC Form 5 (11/09)

CHARGE OF DISCRIMINATION This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.		Charge Presented To: _____ Agency(ies) Charge No(s): 520-2019-01930 <input type="checkbox"/> FEPA <input checked="" type="checkbox"/> EEOC	
New York State Division Of Human Rights and EEOC State or local Agency, if any			
Name (Indicate Mr., Ms., Mrs.) Ms. Amy V. Ramirez Rodriguez		Home Phone (Incl. Area Code) 646-373-9432	
Street Address 16 Colonel Robert Magaw Place, Apartment 24C, New, NY 10033		City, State and ZIP Code NEW YORK DISTRICT OFFICE FEB 14 2019 DATE RECEIVED	
Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)			
Name J. P. MORGAN CHASE		No. Employees, Members 500 or More	
Street Address 270 Park Avenue, New York, NY 10017		City, State and ZIP Code	
Name		No. Employees, Members Phone No. (Include Area Code)	
Street Address		City, State and ZIP Code	
DISCRIMINATION BASED ON (Check appropriate box(es).) <input type="checkbox"/> RACE <input type="checkbox"/> COLOR <input type="checkbox"/> SEX <input type="checkbox"/> RELIGION <input type="checkbox"/> NATIONAL ORIGIN <input type="checkbox"/> RETALIATION <input type="checkbox"/> AGE <input checked="" type="checkbox"/> DISABILITY <input type="checkbox"/> GENETIC INFORMATION <input type="checkbox"/> OTHER (Specify)		DATE(S) DISCRIMINATION TOOK PLACE Earliest Latest 08-21-2014 08-21-2014 <input type="checkbox"/> CONTINUING ACTION	
THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)): I am a female with qualifying disabilities who employed with the above entity as a Business Analyst and Reporting Specialist from May 19, 2014 until my termination on August 21, 2014. I believe I was discriminated against by my employer due to my qualifying disabilities. Specifically, on August 21, 2014, I was wrongfully terminated by Vanessa Morales, Supervisor, due to my disabilities. Based on the above, I believe I was discriminated against by my employers in violation of Title I of the Americans with Disabilities Act of 1990, as amended, and other applicable Federal, state, and local anti-discrimination statutes.			

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures. I declare under penalty of perjury that the above is true and correct.	NOTARY – When necessary for State and Local Agency Requirements I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief. SIGNATURE OF COMPLAINANT  SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (month, day/year)
Feb 14, 2019 Date  Charging Party Signature	